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Attorneys for Ryan Hee

United States District Court

District of Nevada

United States of America,

Plaintiff,

v.

Ryan Hee; and VDA OC, LLC,
Formerly Advantage On Call, LLC,

Defendant.

Case No. 2:21-cr-00098-RFB-BNW

Stipulation to Continue Evidentiary
Hearing

(Second Request)

IT IS HEREBY STIPULATED AND AGREED by and between Richard A. Wright and Sunethra Muralidhara, of Wright Marsh & Levy, counsel for Defendant Ryan Hee; Kathleen Bliss, Carole S. Rendon (Admitted *Pro Hac Vice*), and Mary Pat Brogan (Admitted *Pro Hac Vice*), counsel for Defendant VDA OC, LLC; and attorneys for the Department of Justice Antitrust Division, representing the United States of America, that the Evidentiary Hearing currently set for August 10, 2022 at 10:00 a.m. be continued for at least 30 days. The parties make this request for the following reasons:

- 1 1. On March 30, 2021, the government filed an Indictment (ECF 1) against Mr.
2 Hee and VDA OC, LLC charging both defendants with one count of
3 Conspiracy in Restraint of Trade in violation of 15 U.S.C. § 1.
- 4 2. On September 3, 2021, Defendant Hee filed a motion to dismiss or in the
5 alternative to suppress, and Defendant VDA OC joined the motion. ECF 38,
6 40. This motion is fully briefed. ECF 44, 48, 50. The Court then set an
7 evidentiary hearing on this matter for June 29, 2022. ECF 90.
- 8 3. The parties are currently in the process of negotiating this case and have
9 reached a preliminary resolution as to both defendants that now needs to be
10 confirmed in writing. The parties request additional time to prepare the
11 necessary documents to finalize any agreements and review with each
12 respective defendant.
- 13 4. Thus, the parties now request that the currently set evidentiary hearing be
14 continued for at least 30 days. Should the parties reach a signed written
15 agreement for each defendant, the parties will notify the court and request that
16 the evidentiary hearing be vacated, submit any signed agreements to the Court,
17 and request appropriate hearing dates.

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5. This is the second request to continue the evidentiary hearing. This request is not made for purposes of delay. The defendants are currently not detained and agree to this continuance.

Dated: August 2, 2022

Respectfully submitted,

By: /s/ Albert B. Sambat

Albert B. Sambat

Christopher J. Carlberg

Mikal J. Condon

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U.S. DEPARTMENT OF JUSTICE

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ORDER

Based on the pending Stipulation and Agreement, and good cause appearing, the Evidentiary Hearing currently set for August 10, 2022 at 10:00 a.m. is hereby continued. The ends of justice are served by granting said continuance. The Court hereby ORDERS that the Evidentiary Hearing shall occur on 10/04/2022 at 11:00 AM. Any party to this matter may contact the Court requesting to vacate said hearing should the parties resolve this matter and request other appropriate hearing dates.

IT IS SO ORDERED:



Hon. Richard F. Boulware, II
United States District Judge

8/03/2022

Date